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*Via Electronic Mail – JGuglielmetti@am-truetzschler.com
Via First Class Mail*

May 19, 2015

John Guglielmetti
American Truetzschler, Inc.
Post Office Box 669228
Charlotte, North Carolina 28266

RE: **American Truetzschler**
12300 Moores Chapel Road
Charlotte, Mecklenburg County, North Carolina
NONCD0001257

Dear Mr. Guglielmetti:

The Inactive Hazardous Sites Branch (IHSB) of the North Carolina Division of Waste Management (Division) has reviewed the March 17, 2016 Phase III Remedial Investigation Progress Report (Phase III RI Report) for the above referenced Site, which was received on March 21, 2016. Based on this review, the IHSB offers the following comments:

General Comments

- 1) A review of the Phase III RI Report and available Division records indicates that some further assessment of contaminated media at the American Truetzschler Site is required to complete the remedial investigation (RI) of the Site. There is an assessment gap due to the destruction of monitor wells MW-3S and MW-3D and there being no monitor well screened at the groundwater within the suspected source area. This work phase (Phase IV) should also include sampling of select water-supply wells.
- 2) Based on available records, the IHSB has compiled the following list of contaminants of concern (COCs) for the Site: Acetone, Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroform, Chloroethane, Chloromethane, 1,1-Dichloroethane, 1,2-Dichloroethane, 1,1-Dichloroethene, cis-1,2-Dichloroethene, trans-1,2-Dichloroethene, 1,2-Dichloropropane, 1,4-Dioxane, Ethylbenzene, Ethylene Dibromide, Methylene Chloride, Tetrachloroethene, 1,1,1-Trichloroethane, 1,1,2-Trichloroethane, Trichloroethene, Trichlorofluoromethane, Toluene, Vinyl Chloride, and Xylene. Note: this may not be a comprehensive inventory of contaminants present at the Site and the remedial investigation and remedial action are not limited to this list of constituents and compounds. Moreover, the COC list for the Site may be subsequently revised and amended upon the review and consideration of additional data.

Specific Comments

- 1) The IHSB understands the HH2 (WSW-43) water-supply well of the Harbor House Community Public Water System has been offline since June 2013 and the subsequent pilot-test evaluation of select water treatment technologies has been completed. The IHSB also understands that efforts are underway to construct a service line to supply municipal water to the residents of the Harbor House Community. The IHSB requests that you continue to provide informal and periodic updates of the progress of service line's construction and any substantive event. A complete accounting of all efforts to provide alternative sources of potable water and a detailed summary of construction status and tap installation of the service line will be included in the Phase IV RI Work Plan.
- 2) Routine monitoring of water-supply wells WSW-35, WSW-36, and WSW-37 for COCs will continue on a semi-annual basis with the next sampling event occurring on or before June 30, 2016. In addition, groundwater sampling of water-supply wells WSW-17, WSW-32, and WSW-33 for COCs will be included in the Phase IV RI Work Plan.
- 3) In general, the IHSB does not recommend the permanent abandonment of groundwater monitor or recovery wells unless the well is damaged or threatened with damage (e.g. MV-2V). The IHSB requests postponement of well abandonments until remedial investigation has been completed (with the possible exception of monitor well MW-7). Please note, professional survey data must exist for any monitor or recovery well prior to abandonment and permanent closure. Based on recent groundwater elevation data, the IHSB requests that you continue to maintain monitor well MW-7S.
- 4) Division records indicate monitor wells MW-3S and MW-3D were installed approximately 300 feet north-northeast of the location shown on Figure 3 (*et seq.*) of the Phase III RI Report. In addition, groundwater analytical data illustrated on Figure 8 (*et seq.*) for water-supply well WSW-33 does not compare to the data in Table 2 – "Current Groundwater & Physical Parameter Data." Please revise these minor clerical inconsistencies in figures that will accompany the Phase IV RI Work Plan and any subsequent work plan or report.
- 5) A review of Division records suggests monitor wells MW-18, MW-19, and MW-20, MW-21 (which have been reported as missing) could be related to the former Vacuum Vaporizing Well (UVB) as communicated via electronic mail to Excel Civil & Environmental Associates, PLLC (Excel) on May 12, 2016 and May 13, 2016. The IHSB recommends attempting to locate and evaluate the utility of any remaining infrastructure as potential additions to the current monitor-well network. As noted above in General Comment #1, additional monitor wells are needed to delineate the vertical and lateral extent of the current groundwater plume at the subject property.
- 6) All groundwater monitor-well installations must fully comply with the construction standards pursuant to Subchapter 2C of Title 15A of the North Carolina Administrative Code (15A NCAC 2C). If you have questions regarding the requirements of 15A NCAC 2C, please contact the Water Quality Regional Operations Section of the Division of Water Resources at (704) 663-1699.

- 7) The IHSB understands the current Site remedy employs groundwater withdrawal, treatment, and discharge through National Pollutant Discharge Elimination System (NPDES) Permit # NC0085928. The IHSB recommends that you review the water quality standards for effluent channels as described in 15A NCAC 02B .0228. Upon review of these standards, if you find that a NPDES Permit modification may better represent current conditions at the Site, please contact Robert Sledge of the Division of Water Resources at (919) 807-6398.

Phase IV RI Work Plan

On or before August 17, 2016, please submit a Phase IV RI Work Plan to the IHSB that completes the RI of the Site and appropriately addresses the comments noted above. In addition, the Phase IV RI Work Plan will contain the following items (without limitation):

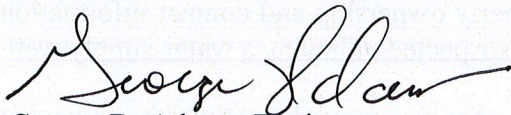
- 1) A current inventory of water-supply wells will be included in the Phase IV RI Work Plan. This inventory will include the most recent property ownership and contact information (revised as appropriate) for each location with or suspected of having a water-supply well.
- 2) The Phase IV RI Work Plan will propose a comprehensive groundwater monitoring event to complete the vertical and lateral assessment of groundwater contamination in all Site aquifer systems. This event may require the installation of additional monitor wells and/or the reuse of existing sampling infrastructure as described in Specific Comment # 5. Upon conclusion of any additional well construction, a groundwater sampling event will be proposed and include groundwater elevation measurements and sampling for Site COCs in all undamaged monitor wells.
- 3) Groundwater data summaries of current and historical data will be updated with the most recent data at the time the Phase IV RI Work Plan is submitted. This data will include routine sampling of the groundwater recovery system and additional sampling of water-supply wells noted above in Specific Comment # 2. In addition, the Phase IV RI Work Plan will include a current Site Map and any corresponding figures that illustrate the locations of proposed monitor wells and a complete inventory of water-supply wells.
- 4) The Phase IV RI Work Plan will describe the current events related to the operational status of the groundwater recovery system and include details such as inspection and maintenance for the system and associated remedial equipment and the monthly volume of recovered and treated groundwater. Please continue to include a running summary of any target Volatile Organic Compound (VOC) analyses of the influent groundwater (minimum of a quarterly sampling) during regular operational cycles, which is currently represented by recovery well RW-1. Extended system downtimes of more than seven days will continue to be promptly reported to the IHSB.
- 5) The Conceptual Site Model (CSM) will be appropriately revised with new information if available, which could include (without limitation) the discovery of unreported sources of environmental contamination, suspected or observed changes in the groundwater plume configuration, recently discovered receptors, new potential pathways for contamination exposure, and observations and conclusions noted during field activities. The CSM is a

living document and must continue to propose a reasonable hypothesis of the Site's dynamic processes by incorporating both current and historical data.

- 6) Records of communication with property owners and occupants for permission to access off-property locations for assessment activities will be clearly documented. These records will include solicitations for water-supply well sampling.
- 7) All items of a "Phase II RI Work Plan" as detailed in the IHSB's (*Guidelines for Assessment and Cleanup*) *Guidelines*. Note: the *Guidelines* are periodically updated. Please use the most current version available.

We appreciate your participation in this remedial investigation. If you have questions, need more information, or require adjustments to this schedule, please contact me at (704) 663-1699.

Sincerely,



George D. Adams, Engineer

Division of Waste Management, NCDEQ

ec: Michael T. Stanforth
Excel Environmental Associates, PLLC

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